



CLINTON BROWN, Pro Se  
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310-487-6453

Note: The Clerk must not refuse to file a paper solely because it is not in the form prescribed by these rules or by a local rule or practice. *Fed. R. Civ. P. 5(d)(4)*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

CLINTON BROWN,  
Plaintiff,  
vs.  
CLARK R. TAYLOR, AICP, THE  
LOS ANGELES COUNTY  
DEPARTMENT OF REGIONAL  
PLANNING,  
Defendant.

CASE NO. 2:22-cv-09203-MEMF-KS  
**Motion for Injunctive Relief**  
**Judge:** Honorable Maame Ewusi-  
Mensah Frimpong  
**Magistrate Judge:** Karen L.  
Stevenson  
**Action Filed:** 12/17/2022  
**Action Due:** 01/12/2023

**MOTION FOR INJUNCTIVE RELIEF**

**NOTICE TO THE COURT**, Plaintiff respectfully requests a writ be issued pursuant to 28 U.S.C. § 1651(a), thus rendering the Constitutional violation, *ad interim*, unviolated.<sup>1</sup> The Fifth Amendment's Self-Executing Takings Clause requires Just Compensation at the time of the Taking and interest until the Taking violation is unviolated. *Knick v. Twp. of Scott*, 139 S. Ct. 2162 (2019). The factual record is not materially disputed by the Defendant, thus a *prima facie* claim is established. (Citations omitted). The Defendant, acting under the color of law,

<sup>1</sup> All Writs Act, Judiciary Act of 1789, § 14, 1 Stat. 73, 81-82 (1789)

deprived Plaintiff's Fifth Amendment Constitutional right upon the Taking of property without Just Compensation. Defendant unilaterally rejected the Plaintiff's solar facility application, without redress. Defendant's actions prevented the Plaintiff from obtaining the signatures required for permit approval.<sup>2</sup> Issuing a writ, *in this case*, would not violate the government's regulatory power and would inviolate the Taking, *thus Just Compensation not unduly burden the Plaintiff and the Public*. (Emphasis added).

**THEREFORE**, Plaintiff requests writ of injunction to inviolate, *ad interim*, the Fifth Amendment violation.

"I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."



Clinton Brown

04/02/2023

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<sup>2</sup> Ex. 1. Department of Public Works Building and Safety Division, "Agency Referral," issued 09/01/2021, and Los Angeles County Department of Regional Planning, "SUBJECT: APPLICATION has been REJECTED," issued 10/12/2021. (original emphasis added).



**COUNTY OF LOS ANGELES**  
**DEPARTMENT OF PUBLIC WORKS**  
**BUILDING AND SAFETY DIVISION**  
**AGENCY REFERRAL**

Office Hours: 7:00 am - 5:30 pm M-Th  
 Plan Checker Hours: 7:00 am - 11:00 am

**CALABASAS**  
**MALIBU DISTRICT OFFICE**

26600 Agoura Rd. Suite 110  
 Calabasas, CA 91803  
 Telephone: (818) 880-4150

**GENERAL PROJECT INFORMATION**

PLAN CHECK: UNC-SOLR210831002871 DISTRICT No: 9.10  
 JOB ADDRESS: 27250 Agoura Road CITY: Agoura Hills  
 APPLICANT: Brown, Clinton EMAIL: projects@atlasdevelopmentgroupllc.c

**THIS NOTICE IS TO INFORM YOU THAT APPROVAL FROM THE AGENCIES MARKED BELOW, IN ADDITION TO BUILDING PLAN CHECK APPROVAL, MUST BE OBTAINED PRIOR TO PERMIT ISSUANCE.** You may need to submit the pertinent plans, plan check number, calculations, reports, etc., directly to these agencies. To assist you, we have listed below the information which you will need to contact these agencies. Follow-up is your responsibility. Please be aware that some items resulting from these agency plan reviews may affect your building plan check. These should be communicated to your Building Plan Check Engineer as soon as possible to prevent unnecessary delays. Submit all agency approvals 48 hours prior to permit issuance. Notify the Plan Check Engineer when all agency approvals have submitted and request review.

**DEPARTMENT OF PUBLIC WORKS**

Clearance Date:

**BUILDING AND SAFETY DIVISION - ELECTRICAL SECTION**

Headquarters M-Th 6:45 - 5:30 (626) 458-3180  
 900 S. Fremont Ave., 3rd Fl, Alhambra, CA 91803-1331  
 ELECTRICAL CODE CHECK

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**OTHER COUNTY DEPARTMENTS**

Clearance Date:

**FIRE PREVENTION BUREAU**

Plan approval is required  
 26600 Agoura Road, # 110, Calabasas, CA 91302  
 (818) 880-0341 Mon-Thurs 7:00-11:00 a.m.  
 Chatsworth area only:  
 23757 Valencia Blvd., Santa Clarita, CA 91355-2192  
 (661) 286-8821 Mon-Fri 8:00 -4:30

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**REGIONAL PLANNING DEPARTMENT**

320 W. Temple St., 13th Floor (Rm. 1360)  
 Los Angeles, CA 90012-3282  
 Public Counter : 1:00 p.m. to 6:00 p.m. M-Th  
 Telephone Hours: 7:00 a.m. to 12:00 p.m. (213) 974-6411 Mon-Thurs  
 Calabasas District Office for General Information: 26600 Agoura Road, # 110, Calabasas, CA 91302  
 (818) 880-3799 Mon-Thurs 7:00 a.m.-11:00 a.m.

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**ADDITIONAL AGENCIES**

Clearance Date:

Calabasas Office - Structural Check

|                              |                                 |
|------------------------------|---------------------------------|
| Plan Checker: Carlos Monzon  | Email: cmonzon@dpw.lacounty.gov |
| Phone Number: (626) 458-6314 | Date: 9/1/2021                  |



# Los Angeles County Department of Regional Planning

*Planning for the Challenges Ahead*



**Amy J. Bodek, AICP**  
Director of Regional Planning

**Dennis Slavin**  
Chief Deputy Director,  
Regional Planning

October 12, 2021

Clinton Brown  
Atlas Development Group  
21472 Calle del Barco Street  
Malibu, CA 90265

**SUBJECT:** APPLICATION has been REJECTED  
**APPLICATION NUMBER:** RPAP2021009108  
**PROJECT NUMBER:** PRJ2021-003782  
**LOCATION:** 27250 AGOURA ROAD, CALABASAS, CA 91302  
(APN: 2064-005-011)

Dear Applicant,

The Department of Regional Planning is in receipt of the application materials you submitted on September 1, 2021 for the Solar Farm Project at 27250 Agoura Road. Upon review of the submitted materials, it has been determined that the proposed project is not permitted at this location and the application has been REJECTED.

Ground mounted utility scale solar facilities are not permitted in Significant Ecological Areas as described in section 22.140.510(C)(5)(a) found here: [https://library.municode.com/ca/los angeles county/codes/code of ordinances?nodeId=TIT22PLZO\\_DIV7STSPUS\\_CH22.140STSPUS\\_22.140.510REEN](https://library.municode.com/ca/los%20angeles%20county/codes/code%20of%20ordinances?nodeId=TIT22PLZO_DIV7STSPUS_CH22.140STSPUS_22.140.510REEN). The proposed project site is located wholly within the Santa Monica Mountains North Area Significant Ecological Area and for this reason, the proposed project cannot be permitted at this location and the application cannot be processed.

If you have any questions concerning the information in this letter or any other questions about your project, please contact Clark Taylor at [ctaylor@planning.lacounty.gov](mailto:ctaylor@planning.lacounty.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "C Taylor".

Clark Taylor, Regional Planner  
Coastal Development Services

